

REMARKS/ARGUMENTS

Applicant respectfully requests the consideration of the following remarks and the reconsideration of the present application.

Claims 1, 13, 25 and 37 were rejected under 35 U.S.C. 112, first paragraph for reciting “comparing ... with at least one of ... to obtain a first comparison value and a second comparison value”. Without agreeing that the Examiner’s rejection was proper, claims 1, 13, 25 and 37 have been amended to remove the phrase “at least one of”. Applicant respectfully submits that the amendment overcomes the rejection. In view of the amendment to claims 1, 13, 25 and 37, claims 8-10, 20-22, 32-34 and 44-46 are also amended to remove the phrase “at least one of” for consistency.

Claim 1 was rejected under 35 U.S.C. 112, second paragraph, for the lack of antecedent basis for the term “the first and second groups” in claim 1. Applicant respectfully disagrees. Claim 1 introduces “a first group” and “a second group” by reciting “determining a first semantic anchor corresponding to a first group of messages and a second semantic anchor corresponding to a second group of messages”, which provides antecedent basis for the term “the first and second groups”. Thus, the withdrawal of the rejection under 35 U.S.C. 112, second paragraph, is respectfully requested.

Claims 1-8, 10-20, 22-32, 34-44 and 46-50 were rejected under 35 U.S.C. 102(b) as being anticipated by “Personalized Information Delivery: An analysis of Information Filtering Methods”, ACM, 35(12), 51-60, 1992, by Foltz et al. (hereinafter “Foltz”). Claims 9, 21, 33 and 45 were rejected under 35 U.S.C. 103(a) as being unpatentable over Foltz in view of “Indexing by Latent Semantic Analysis” by Deerwester et al. (hereinafter “Deerwester”). Applicant respectfully disagrees. New claims 51-54 are added, which are supported by the specification. No new matter is added.

In rejecting claim 1, Examiner considered “the new Technical Memos are ranked in accordance with their relevance to the receiver of interest” (e.g., page 6, lines 35-44, Foltz) as corresponding to the limitation of “filtering the incoming message through classifying the incoming message between the first and second groups based on the first comparison value and the second comparison value”. Applicant respectfully disagrees.

Applicant respectfully submits that ranking the new technical memos (TM) according to Foltz is not “filtering ... through classifying the incoming message between the first and second groups ...”. In Foltz, filtering is based on the relative comparison among the new technical memos. If the entire set of new technical memos is not interesting to the employee, the methods of Foltz will still select the top ones of the set for delivery to the employee, since these technical memos are determined to be more interesting than the bottom ones. If the entire set of new technical memos is interesting to the employee, the methods of Foltz will still eliminate the bottom ones of the set from delivery, since they are determined to be less interesting than the top ones.

Thus, it is clear that in Foltz the method of selecting the interesting ones of the new technical memos is not based on classifying a particular technical memo between “interesting” and “not interesting”.

It is clear that the methods of Foltz are not suitable for classifying incoming messages (e.g., as unsolicited or non-unsolicited). When one incoming message is considered, it is meaningless to rank the single incoming message and select the top ranking message. Further, if one receives a number of emails a day, it is clearly improper to classify the top 25% of the emails as non-unsolicited emails and the bottom 75% of the emails as unsolicited emails.

Thus, the methods of Foltz are based on comparing the new technical memos with each other to determine the relatively more interesting ones. Such methods are clearly not

“filtering the incoming message through classifying the incoming message between the first and second groups based on the first comparison value and the second comparison value”.

Thus, the withdrawal of the rejection under 35 U.S.C. 102(b) for claim 1 is respectfully requested.

Further, Foltz does not show the limitation further recited in claim 2. The Office Action asserted that “the unsolicited messages are messages of interest to the receiver, on page 6, lines 38-44, only the most relevant Technical Memos are presented to the users”. Applicant respectfully disagrees.

For example, although messages from a friend are generally interesting, duplicated messages from a friend are generally not interesting. Although advertisement messages are generally not interesting, some advertisement messages may be interesting. Presenting the most relevant Technical memos to the users is different from classifying an incoming message between a group of messages defined as unsolicited messages and a group of messages defined to not be unsolicited messages.

Further, claim 3 recites:

3. (amended) A method as in claim 2, wherein the second semantic anchor and the first semantic anchor are vectors obtained respectively from previously received unsolicited messages of a training message corpus and previously received messages defined not to be unsolicited messages of the training message corpus.

In Foltz, when a document profile is used, each document in the document profile is for a point of interest. For example, page 6, lines 34-37, of Foltz shows

“For the document profiles, the same type of comparison was done. Each document in the document profile was represented as a separate vector and compared to all new TMs. The new TMs were then ranked based on the

maximum cosine for each TM to any document in the document profile.”

(Page 6, lines 34-37, Foltz)

In Foltz, each document in the document profile was previously rated as relevant; and each document vector represent a single relevant document. No document vector in Foltz represents multiple documents. Thus, in Foltz there is no semantic anchor obtained *from previously received unsolicited messages*.

Note that, when is a word profile is used, the employee specifies the words or phrases for a point of interest, which are not derived from a training message corpus.

Thus, the withdrawal of the rejection under 35 U.S.C. 102(b) for claim 3 is respectfully requested.

Further, claim 49 recites:

49. A method as in claim 3, wherein the second semantic anchor corresponds to a centroid of the previously received unsolicited messages of a training message corpus in the semantic vector space; and the first semantic anchor corresponds to a centroid of the previously received messages defined not to be unsolicited messages of the training message corpus in the semantic vector space.

The Office Action relied upon page 6, lines 13-25, of Foltz for the limitation of centroids. However, page 6, lines 13-25, of Foltz is about statistical relationships between terms and documents. The terms and term weights are not semantic anchors. Page 6, lines 13-25, of Foltz shows no indication of “a centroid of the previously received unsolicited messages of a training message corpus in the semantic vector space” and “a centroid of the previously received messages defined not to be unsolicited messages of the training message corpus in the semantic vector space”. Applicant respectfully submits that the rejection is based upon improper speculation.

The rejection of claim 49 further pointed to a different reference, Deerwester, for “the detailed information about centroid”, which is improper for a rejection under 35 U.S.C. 102(b). If Deerwester were to be relied upon for the rejection, Examiner has the initial burden of factually supporting any prima facie conclusion of obviousness under 35 U.S.C. 103. A prima facie case of obviousness is established by presenting evidence that would have led one of ordinary skill in the art to combine the relevant teachings of the references to arrive at the claimed invention. It is *impermissible* to simply make *a hindsight reconstruction* of the claimed invention using the claim as a template and filling the gaps using the elements from the references.

Further, in Foltz, “Each document in the document profile was represented as a separate vector and compared to all new TMs” (page 6, lines 34-35, Foltz). Thus, each document vector represents only one single document in the document profile. Clearly, such a document vector representing a single document is not a centroid of multiple documents.

Further, Foltz does not show “a centroid of the previously received unsolicited messages”. The documents in the document profile are previously rated as relevant. The document profile does not include documents that are previously rated as not relevant. In Foltz, no documents that are previously rated as not relevant are used to generate a document vector for comparison with new TMs.

Foltz does not suggest the use of centroids of different groups of messages. When a document profile is used, each interest point is based on a single document in the document profile. Since there is no point of “not interesting” in Foltz, there is no “a centroid of the previously received unsolicited messages”, even if “not interesting” or “not relevant” were considered as corresponding to “unsolicited”.

Further, new claims 51-54 recite limitations that are not in the cited references.

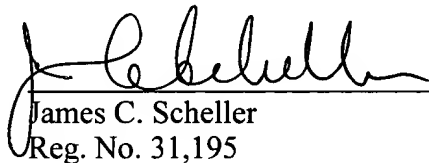
Deerwester was relied upon for the additional limitations recited in the dependent claims 9, 21, 33 and 45. Since Foltz does not show each and every aspect of the independent claims, the description of Foltz and Deerwester do not show each and every aspect of pending claims. Thus, at least for the above reasons, the claims are patentable over Foltz and Deerwester

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due or credit any overages. Furthermore, if an extension is required, Applicant hereby requests such extension.

Respectfully submitted,

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